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Attorneys for THE BANK OF NEW YORK MELLON FKA THE BANK OF NEW YORK,  
SUCCESSOR INDENTURE TRUSTEE TO JPMORGAN CHASE BANK, N.A., AS INDENTURE  
TRUSTEE ON BEHALF OF THE NOTEHOLDERS OF THE CWHEQ INC., CWHEQ REVOLVING  
HOME EQUITY LOAN TRUST, SERIES 2006-C

IN THE MATTER OF:

Karen Lambert aka Karen Leese

DEBTOR(S),

**IN THE UNITED STATES BANKRUPTCY  
COURT FOR THE DISTRICT OF NEW  
JERSEY**

**CHAPTER 13  
CASE NO. 18-21262 MBK**

**STATEMENT AS TO WHY NO BRIEF IS  
NECESSARY IN ACCORDANCE WITH  
“LOCAL RULES OF BANKRUPTCY  
PRACTICE” RULE 3(C)**

The within Notice of Motion requests relief from the automatic stay on the grounds, as set forth on the accompanying Certification, that the debtor(s) have failed to maintain their monthly mortgage payments to the Secured Creditor.

As the facts the secured creditor relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

DATED: April 14, 2022

/s/ Denise Carlon, Esq.

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